STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT
OFFICE OF AIR RESOURCES

OPERATING PERMIT

Admiral Packaging,Inc.

PERMIT NO. RI-07-10

(Renewal date: October 11, 2005)
(Expiration date: October 11, 2010)

Pursuant to the provisions of Air Pollution Control Regulation No. 29, this operating permit is issued to:

Admiral Packaging,Inc.
10 Admiral Street
Providence, RI 02908

This permit shall be effective from the date of its issuance. All terms and conditions of the permit are enforceable by EPA and citizens under the federal Clean Air Act, 42 U.S.C. 7401, et seq., unless specifically designated as not federally enforceable.

Stephen Majkut, Chief
Office of Air Resources

Date of issuance: 10/11/05

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SECTION I. SOURCE SPECIFIC CONDITIONS

A. Requirements for Emissions Unit B001

The following requirements are applicable to:

- Emission unit B001, which is a 12.5 MMBTU/hr Superior boiler, Model No. N4AA6300A, which burns #6 fuel oil. [Approval No. 26]

1. Emission Limitations

a. Particulates

The permittee shall not cause or permit the emissions of particulate matter in excess of 0.1 pounds per million BTU actual heat input. [13.2.1]

b. Opacity

The permittee shall not emit into the atmosphere, any air contaminant for a period or periods aggregating more than three minutes in any one hour, which is greater than or equal to 20 percent opacity. [1.2] Where the presence of uncombined water is the only reason for failure to meet this requirement , such failure shall not be a violation of this permit. [1.4]

c. Sulfur Oxides

Unless the Director declares in writing after a hearing that a shortage of low sulfur fuel exist, the permittee shall not use or store fuel oil with a sulfur content greater than 1.0% by weight. [8.2]

2. Monitoring Requirements

a. Emission unit B001 shall be equipped with an opacity monitor with audio alarm. [6.2.2(a)] The opacity monitoring devices shall be calibrated to sound the alarm at 20 percent opacity, and shall be operated continuously during the combustion of oil. The audio alarm shall be located in an area where it will be heard by the operator or other person responsible for the unit. [6.2.3, 29.6.3(b)]

3. Testing Requirements

a. Particulates

Compliance with the particulate emissions limitations contained in Condition I.A.1.a of this permit, shall be determined by emission testing conducted by the permittee according to Method 5 of 40 CFR 60, Appendix A, or another method approved by the Office of Air Resources and USEPA, shall be used. [13.3.1]

The requirements of particulate emissions testing may be waived if the Director and the USEPA:

(1) Specifies or approves, in a specific case, the use of a reference method with minor changes in methodology; or

(2) Approves the use of an equivalent or alternative method the results of which he has determined to be adequate for indicating whether the permittee is in compliance; or

(3) Finds that the permittee has demonstrated by other means to the Director's and the USEPA's satisfaction that the source is in compliance with the relevant emissions standards. [13.3.3]

In the absence of data from emissions testing, the Director and the USEPA may determine that an emission unit is or is not in compliance with the emissions limitations of Condition I.A.1.a of this permit based on available information including, but not limited to, type of fuel burned, design of unit, efficiency of air pollution control systems, operating and maintenance procedures, and emissions test results on similar units. [13.3.2]

b. Opacity

Tests for determining compliance with the opacity limitations specified in Condition I.A.1.b of this permit shall be performed per 40 CFR 60, Appendix A, Method 9. Additionally, all observers must qualify as per 40 CFR 60, Appendix A, Method 9. [1.3.1, 1.3.2]

c. Sulfur Oxides

Compliance with the sulfur limitations contained in Condition I.A.1.c of this permit shall be determined by the procedures referenced in Condition II.U.2 of this permit. [29.6.3(b)]

B. Requirements for Emissions Units P001 and P002

The following requirements are applicable to:

- Emission unit P001, which is a Windmoeller & Hoelscher flexographic printing press, Model No. Starflex 8-color. P001 is equipped with a 0.4 MMBTU/hr drying oven, which burns natural gas.

- Emission unit P002, which is a Windmoeller & Hoelscher flexographic printing press, Model No. Soloflex 8-color. P002 is equipped with a 25 kW electric drying oven.

- P001 and P002 are associated with air pollution control device C001, which is a 9,500 scfm, 2.5 MMBTU/hr Dec-E-Tech Catalytic Oxidizer, Model No. CI-8500-SP-HE/65. C001 burns natural gas.

1. Emissions Limitations

Windmoeller & Hoelscher 8 Color Starflex Press (P001)

a. P001 shall be equipped with an emission capture system that captures at least 90% of the VOC generated from the operation of P001, for discharge through C001. [Approval No. 1186, 1187 & 1433(A)(1)(a), 21.3.2(c)]

b. The destruction efficiency of C001 for VOC shall be at least 98%. [Approval No. 1186, 1187 & 1433(A)(1)(b), 21.3.1(c)]

c. The emission capture system and C001 shall destroy at least 88.2% of the VOC applied at P001. [Approval No. 1186, 1187 & 1433(A)(1)(c)]

d. The total quantity of VOC emissions from P001 shall not exceed 15.93 pounds per hour. [Approval No. 1186, 1187 & 1433(A)(1)(d)]

e. The total quantity of VOC applied at P001 shall not exceed 135 pounds per hour and 50,000 pounds in any calendar month. [Approval No. 1186, 1187 & 1433(A)(1)(e)]

Windmoeller & Hoelscher 8 Color Soloflex Press (P002)

f. P002 shall be equipped with an emission capture system that captures at least 100% of the VOC generated from the operation of P002, for discharge through C001. [Approval No. 1186, 1187 & 1433(A)(2)(a), 21.3.2(c)]

g. The destruction efficiency of C001 for VOC shall be at least 98%. [Approval No. 1186, 1187 & 1433(A)(2)(b), 21.3.1(c)]

h. The emission capture system and C001 shall destroy at least 98% of the VOC applied at the flexographic printing press. [Approval No. 1186, 1187 & 1433(A)(2)(c)]

i. The total quantity of VOC emissions from P002 shall not exceed 1.7 pounds per hour. [Approval No. 1186, 1187 & 1433(A)(2)(d)]

j. The total quantity of VOC applied at P002 shall not exceed 85 pounds per hour and 12,500 pounds in any calendar month. [Approval No. 1186, 1187 & 1433(A)(2)(e)]

2. Operating Requirements

a. All cleaning of P001 or P002 with VOC containing material shall be conducted within the emissions capture system. VOC emissions captured during cleaning shall be discharged through C001 for destruction. [Approval No. 1186, 1187 & 1433(B)(5)]

b. The inlet temperature to C001 shall be maintained at or above 550^{o}F whenever VOC is being discharged to C001 and the outlet temperature to C001 shall never exceed 900^{o}F. [Approval No. 1186, 1187 & 1433(B)(1-2), 29.6.3(b)]

c. P001 and P002 shall be equipped with an interlock to prevent operation of each press if the inlet temperature to C001 is less than 550^{o}F. [Approval No. 1186, 1187 & 1433(B)(3)]

d. Air passing through any opening in the emissions capture system shall flow into the enclosure continuously. [Approval No. 1186, 1187 & 1433(B)(4)]

e. C001 shall be operated according to its design specifications whenever P001 and/or P002 are in operation or are emitting air contaminants. [16.1]

f. Malfunctions

(1) In the case of a malfunction of C001, all reasonable measures shall be taken to assure resumption of the designed control efficiency as soon as possible. In the event that the malfunction of C001 is expected or may reasonably be expected to continue for longer than 24 hours, and if the permittee wishes to operate P001 and P002 beyond that period, the Director shall be petitioned for a variance under Section 23-23-15 of the General Laws of Rhode Island, as amended. Such petition shall include, but is not limited to, the following: [Approval No. 1186, 1187 & 1433(E)(1) and 16.2]

(a) Identification of the specific air pollution control system (i.e. C001) and the source on which it is installed (i.e. P001 and P002), [Approval No. 1186, 1187 & 1433(E)(1)(a) and 16.2(a)]

(b) The expected period of time that C001 will be malfunctioning or out of service, [Approval No. 1186, 1187 & 1433(E)(1)(b), and 16.2(b)]

(c) The nature and quantity of air contaminants likely to be emitted during said period, [Approval No. 1186, 1187 & 1433(E)(1)(c), and 16.2(c)]

(d) Measures that will be taken to minimize the length of said period, and [Approval No. 1186, 1187 & 1433(E)(1)(d), and 16.2(d)]

(e) The reasons that it would be impossible or impractical to cease the source operation during said period. [Approval No. 1186, 1187 & 1433(E)(1)(e), and 16.2(e)]

(2) The permittee may seek to establish that a malfunction of C001 that would result in noncompliance with any of the terms of this permit or any other applicable air pollution control rules and regulations was due to unavoidable increases in emissions attributable to the malfunction. To do so, the permittee must demonstrate to the Office of Air Resources that: [Approval No. 1186, 1187 & 1433(E)(2)]

(a) The malfunction was not attributable to improperly designed equipment, lack of preventative maintenance, careless or improper operation or operator error; [Approval No. 1186, 1187 & 1433(E)(2)(a)]

(b) The malfunction is not part of a recurring pattern indicative of inadequate design, operation or maintenance; [Approval No. 1186, 1187 & 1433(E)(2)(b)]

(c) Repairs were performed in an expeditious fashion. Off-shift labor and overtime should be utilized, to the extent practicable, to ensure that such repairs were completed as expeditiously as practicable. [Approval No. 1186, 1187 & 1433(E)(2)(c)]

(d) All possible steps were taken to minimize emissions during the period of time that the repairs were performed. [Approval No. 1186, 1187 & 1433(E)(2)(d)]

(e) Emissions during the period of time that the repairs were performed will not: [Approval No. 1186, 1187 & 1433(E)(2)(e)]

(i) Cause an increase in the ground level ambient concentration at or beyond the property line in excess of that allowed by Air Pollution Control Regulation No. 22 and any Calculated Acceptable Ambient Levels; and [Approval No. 1186, 1187 & 1433(E)(2)(e)(1)]

(ii) Cause or contribute to air pollution in violation of any applicable state or national ambient air quality standard. [Approval No. 1186, 1187 & 1433(E)(2)(e)(2)]

(f) The reasons that it would be impossible or impractical to cease the operation of P001 and P002 during said period. [Approval No. 1186, 1187 & 1433(E)(2)(f)]

This demonstration must be provided to the Office of Air Resources within two working days of the time when the malfunction occurred, and contain a description of the malfunction, any steps taken to minimize emissions and corrective actions taken.

The permittee shall have the burden of proof in seeking to establish that noncompliance was due to unavoidable increases in emissions attributable to the malfunction. [Approval No. 1186, 1187 & 1433(E)(2)]

3. Monitoring Requirements

a. C001 inlet/outlet temperatures and the temperature rise across the catalyst bed shall be continuously monitored. [Approval No. 1186, 1187 & 1433(C)(1), 21.7.1(e)(2)(b), 29.6.3(a)]

4. Testing Requirements

a. The control efficiency of C001 specified in Conditions I.B.1.b and I.B.1.g of this permit shall be determined using USEPA-approved test methods. Calculations will be done on a solids applied basis. Continuous compliance shall be maintained at all times. Compliance averaging times shall be met in accordance with USEPA test method 25 of 40 CFR 60, Appendix A, or other methods approved by the Director and USEPA. Compliance shall be

determined on an instantaneous basis (e.g. determined control efficiency shall be used to calculate whether samples from the process meet the applicable emission limit). [21.3.2]

5. Recordkeeping Requirements

a. The permittee shall maintain a record of all measurements, performance evaluations, calibration checks and maintenance or adjustments for each continuous monitor. [Approval No. 1186, 1187 & 1433(D)(5)]

b. The permittee shall maintain the following information at the facility at all times. This information shall be kept current and be made available to the Office of Air Resources and the USEPA upon request. [21.7.1(a)(1-6)]

(1) Printing coating press number,

(2) Hours of operation per day or per year,

(3) Method of application,

(4) Number and types of ink coats applied to the substrate,

(5) Drying method,

(6) Substrate type.

c. For each ink coating, the permittee shall maintain the following records:

(1) Supplier name, ink coating name and Identification number,

(2) Ink Coating density (lb/gal),

(3) Total volatile content of ink coating as supplied (vol %),

(4) Water content of ink coating as supplied (wt%),

(5) Exempt solvent content of ink coating as supplied (wt%),

(6) Solids content of ink coating as supplied (wt%),

(7) Name of diluent, if any,

(8) Identification number of diluent,

(9) Diluent solvent density (lb/gal),

(10) VOC content of diluent (wt%),

(11) Exempt solvent content of diluent (wt%),

(12) Diluent/coating ratio (gal diluent/gal coating).

The permittee shall maintain records from Conditions I.B.5.c.(8) through (12) above for any diluent and solvents used for cleanup operations. [21.7.1(b)(1-12)]

d. The permittee shall determine the total quantity of VOC applied at P001 and P002, including any ink, thinner, reducer, additive or clean-up solvent, in any one-day and any calendar month. [Approval No. 1186, 1187 & 1433(D)(1)]

e. The permittee shall keep the following records on site for P001 and P002 on a daily basis:

(1) Printing coating press number,

(2) Time period,

(3) Ink Coating identification number,

(4) Amount of ink coating used (gallons),

(5) Diluent identification number,

(6) Amount of diluent used (gallons).

The permittee shall also maintain Conditions I.B.5.e(5) and (6) of this permit for clean up operations. [21.7.1(c)(1-6)]

f. The permittee shall maintain the following information for C001 at all times. This information shall be kept current and be made available to the Office of Air Resources and the USEPA upon request. [21.7.1(e)(1)]

(1) Identification number and model number,

(2) Manufacturer,

(3) Installation date,

(4) Printing press(es) controlled,

(5) Whether or not C001 is always in operation when P001 and P002 are in operation,

(6) Type of control device,

(7) Destruction or removal efficiency,

(8) Date tested (If not tested method of determining destruction efficiency),

(9) Design exhaust gas temperature (^{o}F), design temperature rise across catalyst bed (^{o}F), anticipated frequency of catalyst change, and catalyst changes,

(10) Emission test results-inlet VOC concentration (ppm), outlet VOC concentration (ppm), method of concentration determination, and date of determination,

(11) Type and location of capture system,

(12) Capture efficiency (%),

(13) Method of determining capture efficiency.

g. The permittee shall continuously record the inlet/outlet gas temperatures and the temperature rise across the catalyst bed. [Approval No. 1186, 1187 & 1433(C)(1), 21.7.1(e)(2)(b), 29.6.3(a)]

6. Reporting Requirements

a. The permittee shall notify the Office of Air Resources no later than 24 hours after the discovery of an exceedance of any emission limitation set forth in Conditions I.B.1.(a-j) of this permit. Notification shall include the following: [Approval No. 1186, 1187 & 1433(D)(3)]

(1) Identification of the emission limitation exceeded

(2) Suspected reason for the exceedance

(3) Corrective action taken or to be taken

(4) Anticipated length of exceedance

7. Other Requirements

a. There shall be no bypassing of C001 during times when VOC is being discharged to the device. [Approval No. 1186, 1187 & 1433(F)(2)]

b. The emissions capture system on P002 shall meet the criteria for total enclosure contained in 40 CFR 51, Appendix M, Method 204. [Approval No. 1186, 1187 & 1433(F)(3)]

c. To the extent consistent with the requirements of Section I.B. of this permit and applicable federal and state laws, the equipment shall be designed, constructed and operated in accordance with the representation of the facility in the permit application. [1186, 1187 & 1433(F)(4)

C. Requirements for Emissions Unit P003

The following requirements are applicable to:

- Emission unit P003 which is a Windmoeller & Hoelscher flexographic printing press, Model No. Olympia 6-Color. P003 is equipped with a 1.2 MMBTU/hr drying oven, which burns natural gas. P003 is associated with air pollution control device C002, which is a 15,000 scfm, 4.5 MMBTU/hr Dec-E-Tech Catalytic Oxidizer, Model No. CO-15,000 LT HE/69.2, which burns natural gas.

1. Emissions Limitations

a. P003 shall be equipped with an emission capture system that captures at least 85% of the VOC generated from operation of P003 for discharge through C002. [Approval No. 622 & 1364(A)(1), 21.3.2(c)]

b. The destruction efficiency of C002 for VOC shall be at least 98%. [Approval No. 622 & 1364(A)(2), 21.3.1(c)]

c. The emission capture system and C002 shall destroy at least 83.3% of the VOC applied at P003. [Approval No. 622 & 1364(A)(3)]

d. The total quantity of VOC emissions discharged to C002 from P003 shall not exceed 436 pounds per hour. [Approval No. 622 & 1364(A)(4)]

2. Operating Requirements

a. All cleaning of P003 with VOC containing material shall be conducted within the emissions capture system. VOC emissions captured during cleaning shall be discharged through C002 for destruction. [Approval No. 622 & 1364(B)(4)]

b. The inlet temperature to C002 shall be maintained at or above 550^{o}F whenever VOC is being discharged to C002 and the outlet temperature to C002 shall never exceed 900^{o}F. [Approval No. 622 & 1364(B)(1-2), 29.6.3(b)]

c. P003 shall be equipped with an interlock to prevent operation of the press if the inlet temperature to C002 is less than 550°F. [Approval No. 622 & 1364(B)(3)]

d. C002 shall be operated according to its design specifications whenever P003 is in operation or is emitting air contaminants. [16.1]

e. Malfunctions

(1) In the case of a malfunction of C002, all reasonable measures shall be taken to assure resumption of the designed control efficiency as soon as possible. In the event that the malfunction of C002 is expected or may reasonably be expected to continue for longer than 24 hours, and if the permittee wishes to operate P003 beyond that period, the Director shall be petitioned for a variance under Section 23-23-15 of the General Laws of Rhode Island, as amended. Such petition shall include, but is not limited to, the following: [Approval No. 622 & 1364(F)(1) and 16.2]

(a) Identification of the specific air pollution control system (i.e. C002) and the source on which it is installed (i.e. P003), [16.2(a)]

(b) The expected period of time that C002 will be malfunctioning or out of service, [16.2(b)]

(c) The nature and quantity of air contaminants likely to be emitted during said period, [16.2(c)]

(d) Measures that will be taken to minimize the length of said period, and [16.2(d)]

(e) The reasons that it would be impossible or impractical to cease the source operation during said period. [16.2(e)]

3. Monitoring Requirements

a. C002 inlet/outlet temperatures and the temperature rise across the catalyst bed shall be continuously monitored. [Approval No. 622 & 1364(C)(1), 21.7.1(e)(2)(b), 29.6.3(a)]

4. Testing Requirements

a. The control efficiency of C002 specified in Condition I.C.1.b of this permit shall be determined using USEPA-approved test methods. Calculations will be done on a solids applied basis. Continuous compliance shall be maintained at all times. Compliance averaging times shall be met in accordance with USEPA test method 25 of 40 CFR 60, Appendix A, or other methods approved by the Director and USEPA. Compliance shall be determined on an instantaneous basis (e.g. determined control efficiency shall be used to calculate whether samples from the process meet the applicable emission limit). [21.3.2]

5. Recordkeeping Requirements

a. The permittee shall maintain a record of all measurements, performance evaluations, calibration checks and maintenance or adjustments for each continuous monitor. [Approval No. 622 & 1364(E)(4), 29.6.3(a]

b. The permittee shall maintain the following information at the facility at all times. This information shall be kept current and be made available to the Office of Air Resources and the USEPA upon request. [21.7.1(a)(1-6), Approval No. 622 & 1364(E)(1)]

(1) Printing coating press number,

(2) Hours of operation per day or per year,

(3) Method of application,

(4) Number and types of inks coats applied to the substrate,

(5) Drying method,

(6) Substrate type.

c. For each ink coating, the permittee shall maintain the following records:

(1) Supplier name, ink coating name and Identification number,

(2) Ink Coating density (lb/gal),

(3) Total volatile content of ink coating as supplied (vol %),

(4) Water content of ink coating as supplied (wt%),

(5) Exempt solvent content of ink coating as supplied (wt%),

(6) Solids content of ink coating as supplied (wt%),

(7) Name of diluent, if any,

(8) Identification number of diluent,

(9) Diluent solvent density (lb/gal),

(10) VOC content of diluent (wt%),

(11) Exempt solvent content of diluent (wt%),

(12) Diluent/coating ratio (gal diluent/gal coating).

The permittee shall maintain records from Conditions I.C.5.c(8) through (12) above for any diluent and solvents used for cleanup operations. [21.7.1(b)(1-12)]

d. The permittee shall keep the following records on site for P003 on a daily basis:

(1) Printing coating press number,

(2) Time period,

(3) Ink Coating identification number,

(4) Amount of ink coating used (gallons),

(5) Diluent identification number,

(6) Amount of diluent used (gallons),

The permittee shall also maintain records from Conditions I.C.5.d(5) and (6) for clean up operations. [21.7.1(c)(1-6)]

e. The permittee shall maintain the following information for C002 at all times. This information shall be kept current and be made available to the Office of Air Resources and USEPA upon request. [21.7.1(e)(1)]

(1) Identification number and model number,

(2) Manufacturer,

(3) Installation date,

(4) Printing press(es) controlled,

(5) Whether or not C002 is always in operation when P003 is in operation,

(6) Type of control device,

(7) Destruction or removal efficiency,

(8) Date tested (If not tested, method of determining destruction efficiency),

(9) Design exhaust gas temperature (^{o}F), design temperature rise across catalyst bed (^{o}F), anticipated frequency of catalyst change, and catalyst changes,

(10) Emission test results-inlet VOC concentration (ppm), outlet VOC concentration (ppm), method of concentration determination, and date of determination,

(11) Type and location of capture system,

(12) Capture efficiency (%),

(13) Method of determining capture efficiency.

f. The permittee shall continuously record the inlet/outlet gas temperatures and the temperature rise across the catalyst bed. [Approval No. 622 & 1364(C)(1), 21.7.1(e)(2)(b), 29.6.3(a)]

6. Reporting Requirements

a. The permittee shall notify the Office of Air Resources no later than 24 hours after the discovery of an exceedance of any emission limitation set forth in Conditions I.C.1.(a-d) of this permit. Notification shall include the following: [Approval No. 622 & 1364(E)(2)]

(1) Identification of the emission limitation exceeded

(2) Suspected reason for the exceedance

(3) Corrective action taken or to be taken

(4) Anticipated length of exceedance

7. Other Requirements

a. There shall be no bypassing of C002 during times when VOC is being discharged to the device. [Approval No. 622 & 1364(F)(2)]

b. To the extent consistent with the requirements of Section I.C. of this permit and applicable federal and state laws, the equipment shall be designed, constructed and operated in accordance with the representation of the equipment in the preconstruction permit application. [Approval No. 622 & 1364(F)(3)]

c. The permittee shall shut down P003 in the event of a malfunction of the emission capture system that results in or that could result in, emissions in excess of the permit limits. The unit shall remain shutdown until the malfunction has been identified and corrected. [Approval No. 622 & 1364(F)(1)]

D. Requirements for Emission Units P007 and P008

The following requirements are applicable to:

- Emission unit P007, which is a Safety Kleen Remote Reservoir Cold Cleaning Degreasing Tank, Model No. SK-34.

- Emission unit P008, which is a Safety Kleen Remote Reservoir Cold Cleaning Degreasing Immersion Tank, Model No. 10. P008 is equipped with an air agitation system.

1. Operating Requirements

a. Equipment covers and the dipping/rotating baskets shall be constructed of nonporous or nonabsorbent material. Covers must form a tight seal with the sides of P007 and P008 and have no gaps or holes. [36.4.1]

b. When the covers for P007 and P008 are open, drafts at the same elevation as the tank lip must not be greater than 40 meters/minute (130 ft./min.) when measured 1 to 2 meters (3 to 7 feet) upwind. [36.4.2]

c. Leaks must be repaired immediately or P007 and P008 shall be shut down. [36.4.3]

d. P007 and P008 must display a conspicuous summary of proper operating procedures consistent with minimizing emissions of organic solvents. [36.4.4]

e. For P007, solvent spray must be a solid, fluid stream which is delivered at a pressure no greater than 10 pounds per square inch (psi) and which does not cause excessive splashing. [36.4.5]

f. Spills shall be wiped up immediately and wipe rags shall be stored in covered containers meeting specifications in Condition I.D.1.k of this permit. [36.4.6]

g. Porous or absorbent material, such as sponges, fabric, wood or paper products shall not be cleaned in P007 or P008. [36.4.7]

h. Parts baskets or parts shall be drained under the cover and shall not be removed from P007 or P008 for at least 15 seconds or until dripping ceases and the pieces are visually dry, whichever is longer. [36.4.8]

i. Parts shall be oriented for best drainage. [36.4.10]

j. When solvent is added to or drained from P007 and P008, the solvent shall be transferred using threaded or other leakproof couplings and the end of the pipe in the solvent sump shall be beneath the liquid solvent surface. [36.4.11]

k. Solvent, waste solvent, still bottoms and sump bottoms shall be stored in covered containers and waste solvent transferral or disposal shall not allow greater than 20 percent of the waste solvent (by weight) to evaporate into the atmosphere. [36.4.12]

l. P007 and P008 shall be maintained as recommended by the manufacturer of the equipment. [36.4.13]

m. Operators must receive training in proper solvent cleaning procedures and, if requested by representatives of the Office of Air Resources or the USEPA during an inspection, must complete and pass the applicable sections of the test on those procedures described in Appendix A of APC Regulation No. 36. [36.4.14]

n. P007 and P008 shall be equipped with an attached cover that can be operated easily with one hand. The cover shall be closed at all times except during parts entry and removal. [36.5.1]

o. The solvent sumps of P007 and P008 must be equipped with tight fitting covers that are kept closed at all times except during the cleaning of parts. [36.5.2]

p. P007 and P008 and shall be equipped with a freeboard ratio greater than or equal to 0.75. [36.5.3(a)]

q. If a flexible hose or flushing device is used, flushing shall be performed only within the freeboard zone of P007. [36.5.4]

r. The air agitation system on P008 shall be operated to prevent the solvent from splashing against the tank or the parts being cleaned. [36.5.5]

s. The height of solvent in P007 and P008 shall not exceed the manufacturer's fill-line for that machine. [36.5.6]

2. Recordkeeping Requirements

a. The permittee shall maintain the following records:

(1) Training provided to operators of P007 and P008 for the lifetime of the unit, [36.10.4, 29.6.3(b)]

(2) The quantity and type of solvent used in P007 and P008 each year, and [36.10.4(a), 29.6.3(b)]

(3) The date and type of each equipment malfunction or leak and the date the malfunction or leak is repaired. [36.10.4(b), 29.6.3(b)]

E. Requirements for Emissions Unit P009 and P014

- Emission unit P009 consists of the plating department operations at the facility.

- Emission Unit P014 consists of a Nordmeccanica Group laminator, Model No. Super Duplex Compact Model 1500.

There are no specific requirements for P009 and P014. This does not relieve the permittee from compliance of the General Provisions, outlined in Section II of this permit, as they apply to P009 and P014.

F. Requirements for Emissions Unit P010 and P011

- Emission unit P010 consists of the ink mixing room.

- Emission unit P011 consists of the ink storage room.

P010 and P011 are in the permanent total enclosure. VOC emissions from P010 and P011 are collected and controlled by C002.

There are no specific requirements for P010 and P011. This does not relieve the permittee from compliance of the General Provisions, outlined in Section II of this permit, as they apply to P010 and P011.

G. Requirements for Emissions Unit P013

The following requirements are applicable to:

- Emissions unit P013, which is a Greco Brothers Cold Degreaser Dip Tank, Model No. Custom. P013 is in the permanent total enclosure. VOC emissions from P013 are collected and controlled by C002.

1. Operating Requirements

a. Equipment covers and the dipping/rotating baskets shall be constructed of nonporous or nonabsorbent material. Covers must form a tight seal with the sides of P013 and have no gaps or holes. [36.4.1]

b. When the cover for P013 is open, drafts at the same elevation as the tank lip must not be greater than 40 meters/minute (130 ft./min.) when measured 1 to 2 meters (3 to 7 feet) upwind. [36.4.2]

c. Leaks must be repaired immediately or P013 shall be shut down. [36.4.3]

d. P013 must display a conspicuous summary of proper operating procedures consistent with minimizing emissions of organic solvents. [36.4.4]

e. Spills shall be wiped up immediately and wipe rags shall be stored in covered containers meeting specifications in Condition I.G.1.j of this permit. [36.4.6]

f. No porous or absorbent material, such as sponges, fabric, wood or paper products shall be cleaned in P013. [36.4.7]

g. Parts baskets or parts shall be drained under the cover and shall not be removed from P013 for at least 15 seconds or until dripping ceases and the pieces are visually dry, whichever is longer. [36.4.8]

h. Parts having cavities or blind holes shall be tipped or rotated while draining. [36.4.9]

i. Parts shall be oriented for best drainage. [36.4.10]

j. When solvent is added to or drained from P013, the solvent shall be transferred using threaded or other leakproof couplings, and the end of the pipe in the solvent sump shall be located beneath the liquid solvent surface. [36.4.11]

k. Solvent, waste solvent, still bottoms and sump bottoms shall be stored in covered containers and waste solvent transferal or disposal shall not allow

greater than 20 percent of the waste solvent (by weight) to evaporate into the atmosphere. [36.4.12]

l. P013 shall be maintained as recommended by the manufacturer of the equipment. [36.4.13]

m. Operators must receive training in proper solvent cleaning procedures and, if requested by representatives of the Office of Air Resources or the USEPA during an inspection, must complete and pass the applicable sections of the test on those procedures described in Appendix A of APC Regulation No. 36. [36.4.14]

n. P013 shall be equipped with an attached cover that can be operated easily with one hand. The cover shall be closed at all times except during parts entry and removal. [36.5.1]

o. The solvent sump of P013 shall be equipped with a tight fitting cover that is kept closed at all times except during the cleaning of parts. [36.5.2]

p. P013 shall be equipped with a freeboard ratio greater than or equal to 0.75. [36.5.3(a) and Letter dated September 16, 2004 from Darren Austin of the RIDEM to John Wilbur of Union Industries]

q. The solvent height in P013 shall not exceed the manufacturer's fill line. [36.5.6]

2. Recordkeeping Requirements

a. The permittee shall maintain the following records:

(1) Training provided to operators of P013 for the lifetime of the unit, [36.10.4, 29.6.3(b)]

(2) The quantity and type of solvent used in P013 each year, and [36.10.4(a), 29.6.3(b)]

(3) The date and type of each equipment malfunction or leak and the date the malfunction or leak is repaired. [36.10.4(b), 29.6.3(b)]

H. Requirements for Emissions Units T001 and T002

The following requirements are applicable to:

- Emission units T001 and T002, which are two, horizontal, 2,500 gallon above-ground, storage tanks storing VOC.

There are no specific applicable requirements for T001 and T002. This does not relieve the permittee from compliance with the provisions of the Facility Requirements as well as the General Conditions, outlined in Section II of this permit as they apply to emission units T001 and T002.

I. Facility Requirements

1. Capture System

Compliance with Conditions I.B.1.a, I.B.1.f and I.C.1.a shall be achieved by maintaining the facility as a Permanent Total Enclosure that meets the requirements of 40 CFR 51, Appendix M, Method 204. The permittee shall comply with the following conditions at all times:

a. All PTE openings shall be labeled at the facility in accordance with figure 3.3A of the letter dated December 2, 1997, from Eric Blackwell of Union Industries, Inc. to Terrence Tuchon of the Office of Air Resources. [Letter dated December 2, 1997 from Eric Blackwell of Union Industries, Inc. to Terrence Tuchon of the Office of Air Resources, 29.6.3(a)]

b. At no time shall the opening of the PTE for routine or non-routine reasons exceed 5% of the total operating hours calculated on a daily basis. Total operating hours shall be defined as the time C002 is operating. Daily shall be defined as a 24-hour period beginning at 12:00 AM local time. [Letter dated January 27, 1998 from Terrence Tuchon of the Office of Air Resources to Eric Blackwell of Union Industries, Inc., 29.6.3(a)]

c. The normal disposition of the openings during operating hours shall be consistent with that presented in the table titled "Permanent Total Enclosure Opening Inventory," of the letter dated December 2, 1997 from Eric Blackwell of Union Industries, Inc. to Terrance Tuchon of the Office of Air Resources. Additionally, all employees shall be informed of the required operating disposition of each opening. Signs shall be posted on the doors which are required to be closed. [Letter dated December 2, 1997 from Eric Blackwell of Union Industries, Inc. to Terrence Tuchon of the Office of Air Resources, 29.6.3(a)]

d. The average face velocity through the natural draft openings (NDO's) shall be at least 200 feet per minute, and the direction of air flow shall be into the enclosure. [Letter dated December 2, 1997 from Eric Blackwell of Union Industries, Inc. to Terrence Tuchon of the Office of Air Resources, 29.6.3(a)]

e. On a weekly basis, the face velocity at each NDO shall be measured and the flow direction monitored. Utilizing a hot wire anemometer the face velocity shall be measured between the gaps of the vinyl strips themselves or between the vinyl strips and the surrounding wall or floor. The flow direction shall be

determined utilizing smoke tubes. If the measurements indicate that the required ventilation characteristics are not attained, the integrity of the enclosure and the ventilation system shall be examined. Identified deficiencies shall be corrected and noted. Once the corrective action has been completed, the face velocity and flow direction shall be remonitored. This process shall be repeated until the required characteristics are achieved. [Letter dated December 2, 1997 from Eric Blackwell of Union Industries, Inc. to Terrence Tuchon of the Office of Air Resources, 29.6.3(a)]

f. The permittee shall record the face velocity at each NDO and the flow direction shall be recorded. [Letter dated December 2, 1997 from Eric Blackwell of Union Industries, Inc. to Terrence Tuchon of the Office of Air Resources, 29.6.3(a)]

g. The permittee shall maintain a record of any non-routine opening of the enclosure during operating hours, and shall include the following:

(1) The date that the opening occurred; and

(2) The duration and reason of the opening.

These records shall be available for review by the Office of Air Resources and EPA upon request. [Letter dated December 2, 1997 from Eric Blackwell of Union Industries, Inc. to Terrence Tuchon of the Office of Air Resources, 29.6.3(a)]

h. The permittee shall maintain a record of any scheduled, required opening of the enclosure during operating hours (i.e. special deliveries or special maintenance projects). [Letter dated December 2, 1997 from Eric Blackwell of Union Industries, Inc. to Terrence Tuchon of the Office of Air Resources, 29.6.3(b)]

2. The permittee shall file a completed Air Toxics Operating Permit Application with the Office of Air Resources within 60 days of written notice from the Director. [22.5.2] [Not Federally Enforceable]

SECTION II. GENERAL CONDITIONS

A. Annual Emissions Fee Payment

The permittee shall pay an annual emissions fee as established in Air Pollution Control Regulation No. 28 "Operating Permit Fees". [29.6.8(d)]

B. Permit Renewal and Expiration

This permit is issued for a fixed term of 5 years. The permittee's right to operate this source terminates with the expiration of this permit unless a timely and complete renewal application is submitted at least 12 months prior to the date of permit expiration. Upon receipt of a complete and timely application for renewal, this source may continue to operate subject to final action by the Office of Air Resources on the renewal application. In such an event, the permit shield in Condition II.Y of this permit shall extend beyond the original permit term until renewal. This protection shall cease to apply if, subsequent to a completeness determination, the applicant fails to submit by the deadline specified in writing by the Office of Air Resources any additional information identified as being needed to process the application. The application for renewal shall include the current permit number, description of permit revisions and off-permit changes that occurred during the permit term, and any applicable requirements that were promulgated and not incorporated into the permit during the permit term. [29.6.8(a),29.4.2(c), 29.4.6]

C. Transfer of Ownership or Operation

This permit is nontransferable by the permittee. Future owners and operators must obtain a new operating permit from the Office of Air Resources. A change in ownership or operational control of this source is treated as an administrative permit amendment if no other change in this permit is necessary and provided that a written agreement containing a specific date for transfer of permit responsibility, coverage, and liability between the current and new permittee has been submitted to the Office of Air Resources. [29.10.1(a)(4)]

D. Property Rights

This permit does not convey any property rights of any sort, or any exclusive privilege. [29.6.8(c)(4)]

E. Submissions

1. Reports, test data, monitoring data, notifications, and requests for renewal shall be submitted to :

   RIDEM - Office Air Resources
   Compliance Assurance Section
   235 Promenade St. Room 230
   Providence, RI 02908

2. Any records, compliance certifications and monitoring data required by the provisions of this permit to be submitted to USEPA shall be sent to:

   USEPA Region I
   Office of Environmental Stewardship
   Director, Air Compliance Program
   Attn: Air Compliance Clerk
   One Congress St. Suite 1100 (SEA)
   Boston, MA 02114 - 2023

3. Any document submitted shall be certified as being true, accurate, and complete by a responsible official. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. [29.6.8(e)]

F. Inspection and Entry

1. Employees of the Office of Air Resources and its authorized representatives shall be allowed to enter this facility at all reasonable times for the purpose of: [29.6.8(f)(1)]

   a. having access to and copying at reasonable times any records that must be kept under the conditions of this permit; [29.6.8(f)(2)]

   b. inspecting at reasonable times any facilities, equipment (including monitoring and air pollution control equipment), practices, or operations regulated or required under this permit; and [29.6.8(f)(3)]

   c. sampling or monitoring, at reasonable times, substances or parameters for the purpose of assuring compliance with this permit or other applicable requirements.[RIGL 23-23-5(7), 29.6.8(f)(4), Approval No. 1186, 1187 & 1433(F)(5), Approval No. 622 & 1364(F)(4)]

   Nothing in this condition shall limit the ability of USEPA to inspect or enter the premises of the permittee under Section 114 or other provisions of the Clean Air Act.

G. Compliance

1. The permittee must comply with all conditions of this permit. Any noncompliance with a federally enforceable permit condition constitutes a violation of the Clean Air Act and is grounds for enforcement action, for permit termination, revocation and reissuance or modification, or for denial of a permit renewal application. Any noncompliance with a permit condition designated as state only enforceable constitutes a violation of state rules only and is grounds for enforcement action, for permit termination, revocation and reissuance or modification, or for denial of a permit renewal application. [29.6.8(c)(1)]

2. For each unit at the facility for which an applicable requirement becomes effective during the permit term, the permittee shall meet such requirements on a timely basis unless a more detailed schedule is expressly required by the applicable requirement. [29.6.5(a)]

3. It shall not be a defense for a permittee in an enforcement action that it would have been necessary to halt or reduce the permitted activity in order to maintain compliance with the conditions of this permit. [29.6.8(c)(2)]

H. Excess Emissions Due to an Emergency

As the term is used in this condition an "emergency" means any situation arising from sudden and reasonably unforeseeable events beyond the control of this source, including acts of God, which situation requires immediate corrective action to restore normal operation, and that causes this source to exceed a technology-based emission limitation under this permit, due to unavoidable increases in emissions attributable to the emergency. An emergency shall not include noncompliance to the extent caused by improperly designed equipment, lack of preventative maintenance, careless or improper operation, or operator error. [29.6.11(b)]

Technology-based emission limits are those established on the basis of emission reductions achievable with various control measures or process changes (e.g., a new source performance standard) rather than those established to attain a health based air quality standard.

The permittee may seek to establish that noncompliance with a technology-based emission limitation under this permit was due to an emergency. To do so, the permittee shall demonstrate the affirmative defense of emergency through properly signed, contemporaneous operating logs, or other relevant evidence that: [29.6.11(a) & 29.6.11(c)]

1. an emergency occurred and that the permittee can identify the cause(s) of the emergency; [29.6.11(c)(1)]

2. the permitted facility was at the time being properly operated; [29.6.11(c)(2)]

3. during the period of the emergency, the permittee took all reasonable steps to minimize levels of emissions that exceeded the emissions standards, or other requirements in this permit; and [29.6.11(c)(3)]

4. the permittee submitted notice of the emergency to the Office of Air Resources within 2 working days of the time when emission limitations were exceeded due to the emergency. This notice must contain a description of the emergency, any steps taken to mitigate emissions, and corrective actions taken. This notice fulfills the requirements of Condition II.AA.3 of this permit. [29.6.11(c)(4)]

The permittee shall have the burden of proof in seeking to establish the occurrence of an emergency. [29.6.11(d)]

I. Duty to Provide Information

The permittee shall furnish to the Office of Air Resources, within a reasonable time, any pertinent information that the Office of Air Resources may request in writing to determine whether cause exists for modifying, revoking and reissuing, or terminating the permit, or to determine compliance with the permit. Upon request, the permittee shall also furnish to the Office of Air Resources copies of records that the permittee is required to keep by this permit, or for information claimed to be confidential, the permittee may furnish such records directly to the Administrator along with a claim of confidentiality. [29.6.8(c)(5)]

J. Duty to Supplement

The permittee, upon becoming aware that any relevant facts were omitted or incorrect information was submitted in the permit application, shall promptly submit such supplementary facts or corrected information to the Office of Air Resources. The permittee shall also provide additional information as necessary to address any requirements that become applicable to the source after the date a complete renewal application was submitted but prior to release of a draft permit. [29.5.4]

K. Reopening for Cause

The Office of Air Resources will reopen and revise this permit as necessary to remedy deficiencies in the following circumstances:

1. Additional requirements under the Clean Air Act become applicable to a major source 3 or more years prior to the expiration date of this permit. Such a reopening shall be completed no later than 18 months after promulgation of the applicable requirement. No such reopening is required if the effective date of the requirement is later than the expiration date of this permit, unless this permit or any of its terms and conditions has been extended. [29.6.13(a)]

2. The Office of Air Resources or the Administrator determines that this permit contains a material mistake or inaccurate statements were made in establishing the emissions standards or other terms or conditions of this permit. [29.6.13(c)]

3. The Office of Air Resources or the Administrator determines that the permit must be revised or revoked to assure compliance with the applicable requirements. [29.6.13(d)]

Reopenings shall not be initiated before a notice of intent to reopen is provided to the permittee by the Office of Air Resources at least 30 days in advance of the date that this permit is to be reopened, except that the Office of Air Resources may provide a shorter time period (but not less than 5 days) in the case of an emergency. [29.9.5(b)]

Proceedings to reopen and issue this permit shall follow the same procedures as apply to initial permit issuance and shall affect only those parts of this permit for which cause to reopen exists. Such reopening shall be made as expeditiously as practicable. [29.9.5(a)]

All permit conditions remain in effect until such time as the Office of Air Resources takes final action. The filing of a request by the permittee for a permit modification, revocation and reissuance, or termination, or of a notification of planned changes or anticipated noncompliance does not stay any permit condition. [§70.6(a)(6)(iii)]

L. Severability Clause

The provisions of this permit are severable, and if any provision of this permit, or the application of any provision of this permit to any circumstance, is held invalid, the application of such provision to other circumstances, and the remainder of this permit, shall not be affected thereby. [29.6.8(b)]

M. Off-Permit Changes

1. The permittee is allowed to make certain changes that are not addressed or prohibited by this permit without a permit revision, provided that the following conditions are met: [29.11.2(a)]

    a. Each such change shall not violate any term or condition of this permit. [29.11.2(b)]

    b. Each change shall comply with all applicable requirements. [29.11.2(b)]

    c. Changes under this provision may not include changes or activities subject to any requirement under Title IV or modifications under any provision of Title I of the Clean Air Act. [29.11.2(a)]

    d. Before the permit change is made, the permittee must provide contemporaneous written notice to the Office of Air Resources and the

USEPA Region I, except for changes that qualify as insignificant activities in Appendix A of APC Regulation No. 29. This notice shall describe each change, including the date, and change in emissions, pollutants emitted, and any applicable requirement that would apply as a result of the change. [29.11.2(c)]

e. The permit shield does not apply to changes made under this provision. [29.11.2(d)]

f. The permittee shall keep a record describing changes made at the stationary source that result in emissions of a regulated air pollutant subject to an applicable requirement, but not otherwise regulated under this permit, and the emissions resulting from those changes, including any other data necessary to show compliance with applicable ambient air quality standards. The record shall reside at the permittee's facility. [29.11.2(e)]

2. Changes made pursuant to this provision shall not be exempt from the requirement to obtain a minor source permit pursuant to the requirements of Air Pollution Control Regulation No. 9, if applicable. [29.11.2(a)]

3. Changes made pursuant to this provision shall be incorporated into this permit at the time of renewal. [29.11.2(f)]

N. Section 502(b)(10) Changes

1. The permittee is allowed to make changes within this permitted facility that contravene the specific terms of this permit without applying for a permit revision, provided the changes do not exceed the emissions allowable under this permit, whether expressed therein as a rate of emissions or in terms of total emissions and are not Title I modifications. This class of changes does not include:

   a. changes that would violate applicable requirements; or

   b. changes to federally-enforceable permit terms or conditions that are monitoring (including test methods), recordkeeping, reporting, or compliance certification requirements. [29.11.1(a), 29.1.36]

2. The permittee shall provide written notice to the Office of Air Resources and the USEPA Region I of any change made under this provision. The notice must be received by the Office of Air Resources no later than fourteen (14) days in advance of the proposed changes. The notice shall include information describing the nature of the change, the effect of the change on the emission of any air contaminant, the scheduled completion date of the planned change and identify any permit terms or conditions that are no longer applicable as a result of the change. The permittee shall attach each notice to its copy of this permit. [29.11.1(a)(1), 29.11.1(a)(2)]

3. The permittee shall be allowed to make such change proposed in its notice the day following the last day of the advance notice described in paragraph 2 if the Office of Air Resources has not responded nor objected to the proposed change on or before that day. [29.11.1(b)]

4. Any permit shield provided in this permit does not apply to changes made under this provision. If subsequent changes cause the permittee's operations and emissions to revert to those anticipated in this permit, the permittee resumes compliance with the terms and conditions of the permit, and has provided the Office of Air Resources and USEPA with a minimum of fourteen (14) days advance notice of such changes in accordance with the provisions of paragraph 2, the permit shield shall be reinstated in accordance with terms and conditions stated in this permit. [29.11.1(c)]

5. Changes made pursuant to this provision shall be incorporated into the operating permit at the time of renewal. [29.11.1(d)]

O. Emissions Trading

No permit revision shall be required under any approved economic incentives, marketable permits, emissions trading, and other similar programs or processes for changes that are provided for in the permit. [29.6.6(a)]

P. Emission of Air Contaminants Detrimental to Person or Property

The permittee shall not emit any air contaminant which either alone or in connection with other emissions, by reason of their concentration or duration, may be injurious to human, plant or animal life, or cause damage to property or which unreasonably interferes with the enjoyment of life or property. [7.1]

Q. Odors

1. The permittee shall not emit or cause to be emitted into the atmosphere any air contaminant or combination of air contaminants which creates an objectionable odor beyond the property line of this facility. [17.1]

2. A staff member of the Office of Air Resources shall determine by personal observation if an odor is objectionable, taking into account its nature, concentration, location, duration and source. [17.2]

R. Visible Emissions

1. Except as may be specified in other provisions of this permit, the permittee shall not emit into the atmosphere, from any emission unit, any air contaminant, for a period or periods aggregating more than three minutes in any one hour, which is greater than or equal to 20 percent opacity. [1.2] Where the presence of uncombined water

is the only reason for failure to meet this requirement, such failure shall not be a violation of this permit. [1.4]

2. Tests for determining compliance with the opacity limitations specified in this permit shall be performed per 40 CFR 60, Appendix A, Method 9. Additionally, all observers must qualify as per 40 CFR 60, Appendix A, Method 9. [1.3.1, 1.3.2]

S. Open Fires

It shall be unlawful for the permittee to burn any material in an open fire, except as provided in APC Regulation No. 4, Section 4.3. [4.2]

T. Construction Permits

It shall be unlawful for the permittee to construct, install, modify or cause the construction, installation or modification of any stationary source subject to the provisions of APC Regulation No. 9 without obtaining either a minor source permit or a major source permit from the Director. [9.2.1]

U. Sulfur in Fuel

1. Except as may be specified in other provisions of this permit, unless the Director declares in writing after a hearing that a shortage of low sulfur fuel exists, the permittee shall not use or store fuel oil with a sulfur content greater than 1.0% by weight, except for use with marine vessels or motor vehicles. [8.2, 8.3.6]

2. Compliance with the sulfur in fuel limitations contained in this section shall be determined by the procedures listed below or by another method deemed equivalent by the Director and USEPA: [29.6.3(b)]

    a. For each shipment of fuel oil, the permittee shall obtain a certification from the fuel supplier which contains:

        (1) For distillate fuel oil:

            (a) the name of the supplier

            (b) a statement that the oil complies with the specification for fuel oil number 1 or 2, as defined by the American Society for Testing and Materials in ASTM D396-78 "Standard Specification for Fuel Oils."

        (2) For residual fuel oil:

            (a) The name of the supplier,

(b) The nitrogen and sulfur content of the oil and the ASTM method used to determine the nitrogen and sulfur content of the oil,

(c) The location of the oil when the sample was drawn for analysis to determine the nitrogen and sulfur content of the oil, specifically including whether the oil was sampled as delivered to the permittee or whether the sample was drawn from oil in storage at the oil suppliers/refiners facility or another location.

(3) For diesel fuel oil:

(a) The name of the fuel supplier;

(b) A statement that the oil complies with the specification for diesel fuel oil grade 1-D or 2-D, as defined by the American Society for Testing and Materials in ASTM D975-03 "Standard Specification for Fuel Oils." [29.6.3(b)]

b. As an alternative to fuel oil certification, the permittee may elect to sample the fuel oil prior to combustion. Sampling and analysis shall be conducted after each new shipment of fuel oil is received. Samples shall be collected from the fuel tank immediately after the fuel tank is filled and before any fuel oil is combusted. [29.6.3(b), 8.4.1(b)]

c. All fuel oil must be sampled and analyzed according to ASTM methods which have the prior approval of or are required by the Office of Air Resources. [29.6.3(b), 8.4.1(b)]

d. Copies of the fuel oil analysis sheets shall be maintained at the facility and be made accessible for review by the Office of Air Resources or designated personnel of the Office of Air Resources and USEPA. These records shall include a certified statement, signed by a responsible official, that the records represent all of the fuel combusted during each quarter. [29.6.3(b)]

e. The Director may require, under his supervision, the collection of fossil fuel samples for the purpose of determining compliance with the sulfur limitations in this permit. Sampling and analysis of fossil fuels under Condition II.U.2 of this permit shall not limit the collection of samples under this condition. [8.4.3]

V. Air Pollution Episodes

Conditions justifying the proclamation of an air pollution alert, air pollution warning or air pollution emergency shall be deemed to exist whenever the Director determines that the accumulation of air pollutants in any place is attaining or has attained levels which could, if such levels are sustained or exceeded, lead to a substantial threat to the health of persons. If the governor declares an air pollution alert, air pollution warning or air pollution emergency, the permittee shall comply with the applicable requirements contained in APC Regulation No. 10. [10.1]

W. Fugitive Dust

The permittee shall not cause or permit any materials, including but not limited to sand, gravel, soil, aggregate and any other organic or inorganic solid matter capable of releasing dust, to be handled, transported, mined, quarried, stored or otherwise utilized in any way so as to cause airborne particulate matter to travel beyond the property line of the facility without taking adequate precautions to prevent particulate matter from becoming airborne. Such precaution shall be in accordance with good industrial practice as determined by the Director and/or shall be other reasonable fugitive dust prevention measures as determined by the Director. [5.2]

X. Compliance Certifications

1. The permittee shall submit a certification of compliance with permit terms and conditions annually. [29.6.5(c)(1)]

2. The certification shall describe the following:

    a. the permit term or condition that is the basis of the certification; [29.6.5(c)(3)a]

    b. the current compliance status; [29.6.5(c)(3)b]

    c. whether compliance was continuous or intermittent; and [29.6.5(c)(3)c]

    d. the methods used for determining compliance, currently and over the reporting period. [29.6.5(c)(3)d]

3. All compliance certifications shall be submitted to the Office of Air Resources and to the USEPA Region I. It shall be submitted within 60 days following the end of the reporting period which is the calendar year unless otherwise specified. [29.6.5(c)(4)]

4. All compliance certifications shall be certified as being true, accurate, and complete by a responsible corporate official. This certification shall state that, based on information and belief formed after reasonable inquiry, the statements and information in the certification are true, accurate, and complete. [29.6.8(e)]

Y. Permit Shield

1. Compliance with the terms and conditions of this permit shall be deemed compliance with all requirements applicable to the source in the following: Approval No 26, Approval No. 1186, 1187 & 1433, Approval No. 622 & 1364, 40 CFR Part 64, RI APC Regulation Nos. 1, 4, 5, 6, 7, 8, 9, 10, 13, 14, 16, 17, 21, 22, 28, 29, 36. [29.6.12(a)(1)]

2. The Office of Air Resources has determined that Emission units. B001, P001, P002, P003, P007, P008, P009, P010, P011, P013, P014, T001, and T002 are not subject to the following: RI APC Regulation Nos. 2, 3, 11, 12, 15, 19, 20, 24, 25, 26, 27, 30, 31, 32, 33, 35, 39, and 41 and 40 CFR 63, Subpart KK. [29.6.12(a)(2)]

3. Nothing in this permit shall alter or affect the following:

   a. the provisions of Section 303 of the Clean Air Act, including the authority of USEPA under that Section. [29.6.12(c)(1)]

   b. the liability of the permittee for any violation of applicable requirements prior to or at the time of permit issuance. [29.6.12(c)(2)]

   c. the applicable requirements of the acid rain program consistent with Section 408 of the Clean Air Act. [29.6.12(c)(3)]

   d. the ability of the USEPA to obtain information under Section 114 of the Act. [29.6.12(c)(4)]

4. If it is determined that this operating permit was issued based on inaccurate or incomplete information provided by the permittee, this permit shield shall be void as to the portions of this permit which are affected, directly or indirectly, by the inaccurate or incomplete information. [29.6.12(d)]

Z. Recordkeeping

1. The permittee shall, at the request of the Director, maintain and record of and provide data on operational processes, fuel usage, raw materials, stack dimensions, exhaust gas flow rates and temperatures, emissions of air contaminants, steam or hot water generator capacities, types of equipment producing air contaminants and air pollution control systems or other data that may be necessary to determine if the facility is in compliance with air pollution control regulations. [14.2.1]

2. All records and supporting information required by this permit shall be maintained at the permittee's 10 Admiral Street facility for a period of at least 5 years from the date of sample monitoring, measurement, report or application, and shall be made available to representatives of the Office of Air Resources and USEPA upon request.

Supporting information includes all calibration and maintenance records and all original strip-chart recordings for continuous monitoring instrumentation, and copies of all reports required by this permit. [14.2.1, 29.6.4(a)(2), 21.7.1(d), 36.10.4, Approval No. 622 & 1364(E)(4) and (E)(5), Approval No. 1186, 1187 & 1433(D)(5) and (D)(6)]

3. The permittee shall keep records of required monitoring information that include the following:

   a. The date, place , and time of sampling or measurements; [29.6.4(a)(1)a]

   b. The date(s) analyses were performed; [29.6.4(a)(1)b]

   c. The company or entity that performed the analyses; [29.6.4(a)(1)c]

   d. The analytical techniques or methods used; [29.6.4(a)(1)d]

   e. The results of such analyses; and [29.6.4(a)(1)e]

   f. The operating conditions as existing at the time of sampling or measurement. [29.6.4(a)(1)f]

AA. Reporting

1. The information recorded by the permittee pursuant to Condition II.Z.1 of this Section shall be summarized and reported at least annually to the Director. It shall be submitted by April 15th unless otherwise specified. [14.2.2] Information submitted pursuant to this condition will be correlated with applicable emission limitations and other applicable emissions information and will be made available for public inspection. [14.2.3]

2. The permittee shall submit reports of any required monitoring for each semi annual period ending 30 June and 31 December of every calendar year. These reports shall be due to the Office of Air Resources no later than forty-five (45) days after the end of the reporting period. All instances of deviations from permit requirements must be clearly identified in such reports. All required reports must be certified by a responsible official consistent with condition II.X.4. [29.6.4(b)(1)]

3. Deviations from permit conditions, including those attributable to upset conditions as defined in this permit, shall be reported, in writing, within five (5) business days of the deviation, to the Office of Air Resources. Reports shall describe the probable cause of such deviations, and any corrective actions or preventive measures taken. Each report must be certified by a responsible official consistent with Condition II.X.4. of this permit. [29.6.4(b)(2)]

4. The Office of Air Resources shall be notified in writing of any planned physical change or operational change to the emissions units and control devices identified in this permit. Such notification shall include information describing the nature of the change, information describing the effect of the change on the emissions of air contaminants and the scheduled completion date of the planned change. Any change which may result in an increased emission rate of any air contaminant shall be subject to approval of the Office of Air Resources. [Approval No. 1186, 1187 & 1433(D)(4), Approval No. 622 & 1364(E)(3)]

BB. Credible Evidence

For the purpose of submitting compliance certifications or establishing whether or not the permittee has violated or is in violation of any provision of this permit, the methods used in this permit shall be used, as applicable. However, nothing in this permit shall preclude the use, including the exclusive use, of any credible evidence or information, relevant to whether the permittee would have been in compliance with applicable requirements if the appropriate performance or compliance test procedures or methods had been performed. [40 CFR 51.212(c), 52.12(c) and 52.33(a)]

CC. Emission Statements

1. The permittee shall submit annually an emission statement which includes information for both VOC and NO_x if facility wide actual emissions are 25 tons per year of either pollutant. Emission statements shall be submitted to the Director on April 15th of each year unless otherwise specified. The permittee may apply to the Office of Air Resources to be allowed to discontinue submitting annual emission statements if actual emissions at the facility decrease to below 10 tons per year as a result of a permanent process change. [14.3.1] The permittee shall submit an emission statement in a format approved by the Office of Air Resources. The emission statement shall contain the following information: [14.3.2]

    a. A certification that the information contained in the emission statement is accurate and complete to the best knowledge of the certifying individual.

    b. The full name, title, signature, date of signature, and telephone number of the certifying individual.

    c. Facility identification information, including the full name, physical location, mailing address, latitude, longitude, and four digit SIC code(s).

    d. Process data pertaining to each process emitting VOC and/or NO_x, including:

        (1) Annual and typical ozone season daily fuel use,
        (2) Annual and typical ozone season daily process rate(s), and
        (3) Process throughput while air pollution control equipment was not in operation.

e. Operating data pertaining to each process emitting VOC and/or NO_x during the reporting year, including:

(1) Percentage annual throughput,
(2) Average hours of operation per day during the reporting year and on a typical ozone season day,
(3) Average number of days of operation per week during the reporting year and during a typical ozone season week, and
(4) Weeks of operation during the reporting year and during the peak ozone season.

f. Control equipment information, including:

(1) Specific primary and secondary control equipment for each process emitting VOC and/or NO_x,
(2) Current overall control efficiency for each piece of control equipment (indicated by percent capture and percent destruction or removal), and
(3) Control equipment downtime during the reporting year and during the peak ozone season.

g. Emissions information, including:

(1) Actual annual and typical ozone season daily emissions of VOC and NO_x for each process. Emissions should be reported in tons per year and in pounds per day.
(2) A description of the emission calculation method and, if applicable, emission factor(s) used, and
(3) The calendar year for which emissions are reported.

h. Any additional information required by the Director to document the facility's emission statements.

DD. Miscellaneous Conditions

1. This permit may be modified, revoked, reopened, reissued or terminated for cause. The filing of a request, by the permittee, for a permit modification, revocation and reissuance or termination or of a notification of planned changes or anticipated noncompliance does not release the permittee from the conditions of this permit. [29.6.8(c)(3)]

2. Any application for a permit revision need only submit information related to the proposed change. [29.4.3(c)]

3. Terms not otherwise defined in this permit shall have the meaning given to such terms in the referenced regulation.

4. Where more than one condition in this permit applies to an emission unit and/or the entire facility, the most stringent condition shall apply.

SECTION III. SPECIAL CONDITIONS

This section contains air pollution control requirements that are applicable to this facility and the United States Environmental Protection Agency enforces these requirements.

A. Prevention of Accidental Releases

Union Industries, Inc. is subject to the requirements of the General Duty Clause under Section 112(r)(1) of the Clean Air Act. This clause specifies that owners or operators of stationary sources producing, processing, handling or storing a chemical in any quantity listed in 40 CFR part 68 or any other extremely hazardous substance have a general duty to identify hazards associated with these substances, and to design, operate and maintain a safe facility, in order to prevent releases and to minimize the consequences of accidental releases which may occur.